

FCC Proceeding 17-108 concerning Internet Regulations
Comment by Jessica Wolff
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My name is Jessica Wolff and I am submitting this comment to the FCC's proposal to repeal the net neutrality rules. I strongly object to the FCC's proposal to repeal net neutrality and to stop regulating Internet Service Providers/Internet as Telecommunications services.

I have my own patent law firm and I work almost exclusively from a home office. Before starting my own solo-practice firm, for 20 years I worked at large global law firms and gained a special expertise in pharmaceutical patent law. Now that I have my own firm, I am able to provide sophisticated patent counselling to smaller companies trying to develop new therapies at a much more affordable price. There are many other solo-practitioners that provide legal services to smaller companies and individuals who cannot afford to pay the fees charged by large law firms. Solo-practitioners would not be able to provide competent counsel to our clients without the same internet access that the large law firms have.

Patent attorneys in particular need fast and reliable internet. The United States Patent and Trademark Office (USPTO) strongly encourages patent practitioners to submit all papers using an electronic filing system on the web (called EFS-Web). As a patent attorney, I have to submit voluminous filings to the USPTO within strict deadlines. Thus, it is vital that my internet access be fast and reliable. If the FCC allows Internet Service Providers to slow down my internet access in favor of other customers, then I will either have to pay more for better internet access or file patent applications by United States Priority Mail Express in order to secure the filing date. Having to pay more for internet service would be bad for me as a business owner and ultimately my clients. And if I have to use US Priority Mail Express, the USPTO would have to deal with more papers that they ultimately have to scan to comply with their own regulations to have an electronic Patent Application Information Retrieval (PAIR) system, thus increasing the government's burden in running an efficient patent office.

I strongly believe that Internet Service Providers should be regulated as telecommunications services companies under Title II. I purchase my internet access through Spectrum, formerly Time-Warner cable, and that is supposed to give me fast and reliable access to the internet. Although I do get email through Spectrum for home use, I primarily use GoDaddy to host my business website and email. It would negatively impact my business if Spectrum could slow down my access to my business email communications because it is hosted by another company. Spectrum also provides me with my home and business phones, and my cable television service. I have a home alarm system that uses my internet connection, but my alarm monitoring system is not provided by Spectrum. I would not want Spectrum to be able to impede my alarm monitoring by slowing down my access to Spectrum's alarm competitors. My cell phone carrier is Verizon, but I do not get good cell reception in my home which makes me even more dependent on fast and reliable access to the internet for telephone calls. Spectrum, as my internet service provider, controls my telecommunications, and should be regulated accordingly.

I understand that some have argued that broadband does not meet the statutory definition of telecommunications because consumers do not specify the IP addresses and caching servers they want to connect to when they go to a website. I disagree and view this argument as hyper technical. This

argument is like saying that a street number and name does not specify an address because it does not provide the GPS coordinates. When I put in the name of a website, I have a reasonable expectation of getting there without having to look up the numbers for the IP address and I don't care about the particular servers or other nitty-gritty details about the technology. Broadband service providers should be regulated by the FCC as a common carrier both with regard to net neutrality, but also other consumer protection items such as privacy, fraudulent billing, and price gouging.

Sincerely,

/Jessica Wolff/

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